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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

VICTOR SANCHEZ,
Plaintiff,

vs.

ALBERTSON'S LLC, a foreign limited liability
company; DOES 1 through 100; and ROE
CORPORATIONS 101 through 200,
Defendants.

Case No.: 2:19-cv-02017-JAD-DJA

**~~[PROPOSED]~~ STIPULATION AND
ORDER TO EXTEND BRIEFING
SCHEDULE ON DEFENDANT'S,
MOTION FOR RULE 37
SANCTIONS [ECF 41]**

COMES NOW, Plaintiff, VICTOR SANCHEZ ("Sanchez"), by and through his counsel of record, The Schnitzer Law Firm and the Law Firm, and Defendant, ALBERTSON'S LLC ("Albertsons") by and through its counsel of record the law firm Backus, Carranza & Burden, hereby submit their Stipulation and Order to Extend the briefing deadlines to Defendant's Motion for Rule 37 Sanctions (the "Motion") [ECF 41].

WHEREAS, on June 28, 2021, Albertson filed the Motion;

WHEREAS, Sanchez's Response to the Motion is currently due on July 12, 2021, and Albertsons' Reply to the Motion is due on July 19, 2021;

WHEREAS, Sanchez requests additional time to prepare its Response to the Motion, and Albertsons therefore agree that additional time is necessary to prepare the Reply;

WHEREAS, the Parties agree that Sanchez may have an extension of time until July 19, 2021 to Respond to the Motion;

WHEREAS, the Parties further agree that Albertsons may have a corresponding additional extension of time until July 26, 2021 to file a Reply to the Response to the Motion;



1 WHEREAS, Plaintiff and Defendant agree that this extension will serve the interests of
2 the parties and judicial economy;

3 WHEREAS, this stipulation is not made for the purpose of delay or obstruction but is
4 made in good faith, and the extension will not result in prejudice to any party.

5 THEREFORE, IT IS HEREBY STIPULATED that:

6 1. Plaintiff, Sanchez's Response to the Motion shall be extended to July 19, 2021.

7 2. Defendant, Albertson's Reply shall also be extended until July 26, 2021.

8 THE SCHNITZER LAW FIRM

BACKUS, CARRANZA & BURDEN

9 DATED this 12 day of July 2021

DATED this 12 day of July 2021.

10 BY: /s/ Jordan P. Schnitzer, Esq.

BY: /s/ Jack P. Burden, Esq.

11 JORDAN P. SCHNITZER, ESQ.

JACK P. BURDEN, ESQ.

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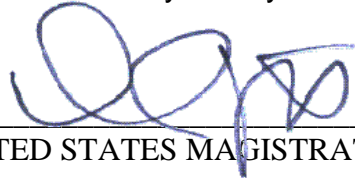
Attorneys for Plaintiff

Attorneys for Defendant, Albertson's LLC

17 **ORDER**

18 IT IS SO ORDERED.

19 DATED this 13th day of July 2021.

20 

21 UNITED STATES MAGISTRATE JUDGE

RE: Sanchez v. Albertsons SAO to Extend Briefing on Motion for Rule 37 Sanctions [ECF 41]

Jack Burden <jackburden@backuslaw.com>

Mon 7/12/2021 4:44 PM

To: Melisa Gabhart <Melisa@TheSchnitzerLawFirm.com>; Jacquelyn Franco <jacquelynfranco@backuslaw.com>

Cc: Jordan Schnitzer <Jordan@TheSchnitzerLawFirm.com>; Katri Ching <kching@backuslaw.com>

You can use my e signature

Jack P. Burden, Esq.

BACKUS, CARRANZA & BURDEN

3050 S. DURANGO DRIVE

LAS VEGAS, NV 89117

(702)-872-5555 (228), Fax 702-872-5545

From: Melisa Gabhart

Sent: Monday, July 12, 2021 4:27 PM

To: Jack Burden <jackburden@backuslaw.com>; Jacquelyn Franco <jacquelynfranco@backuslaw.com>

Cc: Jordan Schnitzer <Jordan@TheSchnitzerLawFirm.com>; Katri Ching <kching@backuslaw.com>

Subject: Re: Sanchez v. Albertsons SAO to Extend Briefing on Motion for Rule 37 Sanctions [ECF 41]

Importance: High

Hello-

Following up on this, can you please advise?

Sincerely,

Melisa Gabhart

Paralegal to Jordan P. Schnitzer, Esq.



TheSchnitzerLawFirm.com

Tel 702.960.4050 | Fax 702.960.4092

Email Melisa@TheSchnitzerLawFirm.com

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From: Melisa Gabhart
Sent: Monday, July 12, 2021 12:03 PM
To: Jack Burden <jackburden@backuslaw.com>; Jacquelyn Franco <jacquelynfranco@backuslaw.com>
Cc: Jordan Schnitzer <Jordan@TheSchnitzerLawFirm.com>
Subject: Sanchez v. Albertsons SAO to Extend Briefing on Motion for Rule 37 Sanctions [ECF 41]

Good Afternoon-

Attached is the SAO to extending briefing on Motion for Rule 37 Sanctions [ECF 41] in the above-referenced case.

If you agree as to form and content, please grant permission for the use of your e-signature and we will get it submitted to the Court.

Sincerely,

Melisa Gabhart

Paralegal to Jordan P. Schnitzer, Esq.



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